

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
EUCLIDES SOTO, LOUIS A. MARTINEZ,	)	NO.: 04-10892-JLT
JOSE RAMIREZ, CLEMENTE HERNANDEZ,	)	
CESAR PIZARO, ELISON PENA,	)	
JUAN COLON, JOSE ORTIZ,	)	
RAFAEL TORRES, ANGEL BAEZ,	)	
ANTONIO MARTINEZ, WILFREDO ORTIZ,	)	
EULOGIO ORTIZ, MIRRAIN MIRANDA,	)	
RAFAEL MORENO, NELSON ACEVEDO,	)	
and RAMON RODRIGUEZ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
UNITED STEELWORKERS OF AMERICA,	)	
ITS LOCAL 421-U, ET. ALS.	)	
	)	
Defendants.	)	
_____	)	

**MOTION FOR PROPOSED ORDER**

Now come the plaintiffs and move that the court enter the following order as a compromise of the positions raised in the motion to strike part of the amended complaint and the opposition to it as follows:

1. To permit the depositions of four plaintiffs;
2. To produce for copying documents, if any not produced before, relevant to the action, as it now is amended, per the court order of March 6, 2006.
3. To complete discovery within 90 days, as no trial date has been scheduled.

Respectfully Submitted,

Date: April 21, 2006

/s/ Robert O. Berger  
Robert O. Berger, BBO #: 038900  
John Lee Diaz, Esq.  
Law Offices of John Lee Diaz  
801A Tremont Street  
Boston, MA 02118  
11 Beacon Street, Suite 1210  
Boston, MA 02108  
Tel (617) 423-7575  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I, Robert O. Berger, hereby certify that I have served a true and exact copy of the above document by electronic transfer or first class mail, postage prepaid on the following named persons:

Harold Lichten, Esq.  
Alfred Gordon, Esq.  
Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, PC  
18 Tremont Street, Suite 500  
Boston, MA 02108  
(*Electronic Transfer*)

Theresa Merrill Stones, Esq.  
United Steelworkers of America  
Five Gateway Center  
Pittsburgh, PA 15222  
(*First Class Mail*)

Date: April 21, 2006

/s/ Robert O. Berger  
Robert O. Berger (BBO #: 038900)